




Exhibit 4

Claim	Analysis
<p>[1.1] A modular computer user interface system comprising:</p>	<p>To the extent preamble is limiting, Dell Technologies (“Defendant”) makes, uses, sells and/or offers for sale a modular computer user interface system.</p> <p>This element is infringed literally, or in the alternative, under the doctrine of equivalents.</p> <p>For example, Defendant provides XPS 15¹ (used herein as an exemplary product) and auxiliary modules including but not limited to USB Wired Numeric Keypad (used herein as an exemplary product) and Wireless Numeric Keypad which collectively forms a modular computer user interface system.</p> <div data-bbox="520 737 1934 1224">  <p>The screenshot shows the Dell XPS 15 Laptop product page. It features a high-quality image of the laptop with a vibrant blue and white abstract wallpaper. To the right of the image, the product name 'XPS 15 Laptop' is displayed in a large, bold font. Below the name is a star rating of 4.1 (5769 reviews) and a link to 'Ask a question'. A list of specifications follows, including the 9th Generation Intel Core i7-9750H processor, Windows 10 Home, NVIDIA GeForce GTX 1650 4GB GDDR5 graphics, 16GB DDR4-2666MHz memory, and a 512GB M.2 PCIe NVMe SSD. A 'Ports & Slots' link is also present. At the bottom of the specifications, the estimated value is listed as \$1,849.99, and the current price is \$1,399.99. A 'Compare' button is visible in the top right corner of the product image area.</p> </div> <p>Source: https://www.dell.com/en-us/shop/dell-laptops/xps-15-laptop/spd/xps-15-7590-</p>

¹ While XPS 15 has been used as an exemplary infringing product, all Dell laptops including but not limited to Vostro Series, Inspiron Series, XPS Series, G Series, Rugged Series, Latitude Series and/or Alienware Series as well as variants and versions of these products have same functionality. The presently charted exemplary infringing product is representative for purposes of illustrating infringement of the other Dell devices.

	<p>laptop/xn7590edldh#features_section</p> <div data-bbox="577 474 940 1003"> </div> <div data-bbox="1260 337 1927 386"> <h2>USB WIRED NUMERIC KEYPAD</h2> </div> <div data-bbox="1260 402 1717 435"> <p>★★★★★ 4.4 (28) Ask a question</p> </div> <div data-bbox="1260 500 1537 584"> <p>\$25.99 Free Standard Delivery</p> </div> <div data-bbox="1260 630 1852 766"> <p>Financing As low as \$20/mo.^ Apply for credit Up to \$1 back in rewards View Delivery Dates</p> </div> <div data-bbox="1192 743 1243 815"> </div> <div data-bbox="1285 808 1726 876"> <p>Add to Cart</p> </div> <div data-bbox="1260 906 1936 938"> <p>Manufacturer Part AKP10US Dell Part A6928588 Order Code A6928588</p> </div> <div data-bbox="1260 974 1444 1006"> <p><input type="checkbox"/> Compare</p> </div> <p>Source: https://www.dell.com/en-us/shop/usb-wired-numeric-keypad/apd/a6928588/pc-accessories</p>
<p>[1.2] a processor,</p>	<p>Defendant provides a modular computer user interface system comprising a processor.</p> <p>This element is infringed literally, or in the alternative, under the doctrine of equivalents.</p> <p>For example, Defendant's XPS 15 comprises a processor including but not limited to 9th Generation Intel Core i7-9750H processor.</p>

	<div data-bbox="525 240 1942 730">  <div data-bbox="1270 316 1533 365">XPS 15 Laptop</div> <div data-bbox="1270 373 1617 397">★★★★★ 4.1 (5769) Ask a question</div> <div data-bbox="1270 414 1932 462" style="border: 2px solid red;">  9th Generation Intel® Core™ i7-9750H (12MB Cache, up to 4.5 GHz, 6 cores) </div> <div data-bbox="1270 462 1659 633"> <div>Windows 10 Home, 64-bit, English</div> <div>NVIDIA® GeForce® GTX 1650 4GB GDDR5</div> <div>16GB DDR4-2666MHz, 2x8G</div> <div>512GB M.2 PCIe NVMe Solid State Drive</div> <div>Ports & Slots</div> </div> <div data-bbox="1270 657 1438 722"> <div>Est. Value \$1,849.99</div> <div>\$1,399.99</div> </div> </div> <div data-bbox="525 738 1942 820"> <p>Source: https://www.dell.com/en-us/shop/dell-laptops/xps-15-laptop/spd/xps-15-7590-laptop/xn7590edldh#features_section</p> </div> <div data-bbox="525 844 808 901">XPS 15 Laptop</div> <div data-bbox="525 974 829 1031"> <h2>Components</h2> </div> <div data-bbox="525 1071 1491 1161"> <p>Processor More Info</p> <p>9th Generation Intel® Core™ i7-9750H (12MB Cache, up to 4.5 GHz, 6 cores)</p> </div> <div data-bbox="525 1193 1942 1274"> <p>Source: https://www.dell.com/en-us/shop/dell-laptops/xps-15-laptop/spd/xps-15-7590-laptop/xn7590edldh#features_section</p> </div>
<p>[1.3] a platform including a keyboard mounted thereon,</p>	<p>Defendant provides a modular computer user interface system comprising a platform including a keyboard mounted thereon, said processor electrically connected to and responsive of data communication from said keyboard.</p>


<p>said processor electrically connected to and responsive of data communication from said keyboard,</p>	<p>This element is infringed literally, or in the alternative, under the doctrine of equivalents.</p> <p>For example, Defendant's XPS 15 comprises a platform including a Backlit keyboard mounted thereon. XPS 15 comprises a processor including but not limited to 9th Generation Intel Core i7-9750H processor which is electrically connected to the Backlit keyboard and processes user input from the Backlit keyboard.</p> <div data-bbox="588 594 1323 1161" data-label="Image"> </div> <p>Platform including a keyboard mounted thereon</p> <p>Source: https://www.dell.com/en-us/shop/dell-laptops/xps-15-laptop/spd/xps-15-7590-laptop/xn7590edldh#features_section (annotated)</p>
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See what you've been missing

A standard backlit keyboard illuminates your keys so you can stay productive in low-light or no-light rooms while typing.

Source: https://www.dell.com/en-us/shop/dell-laptops/xps-15-laptop/spd/xps-15-7590-laptop/xn7590edldh#features_section

	<div data-bbox="520 240 1934 738">  <div data-bbox="1276 321 1535 365">XPS 15 Laptop</div> <div data-bbox="1276 375 1619 402">★★★★★ 4.1 (5769) Ask a question</div> <ul style="list-style-type: none"> 9th Generation Intel® Core™ i7-9750H (12MB Cache, up to 4.5 GHz, 6 cores) Windows 10 Home, 64-bit, English NVIDIA® GeForce® GTX 1650 4GB GDDR5 16GB DDR4-2666MHz, 2x8G 512GB M.2 PCIe NVMe Solid State Drive Ports & Slots <div data-bbox="1276 662 1444 690">Est. Value \$1,849.99</div> <div data-bbox="1276 695 1394 722">\$1,399.99</div> </div> <div data-bbox="520 743 1934 816"> <p>Source: https://www.dell.com/en-us/shop/dell-laptops/xps-15-laptop/spd/xps-15-7590-laptop/xn7590edldh#features_section</p> </div> <div data-bbox="541 857 814 901">XPS 15 Laptop</div> <hr/> <div data-bbox="541 982 825 1036">Components</div> <div data-bbox="541 1079 833 1117"> Processor More Info </div> <div data-bbox="541 1128 1486 1166"> 9th Generation Intel® Core™ i7-9750H (12MB Cache, up to 4.5 GHz, 6 cores) </div> <div data-bbox="520 1198 1934 1271"> <p>Source: https://www.dell.com/en-us/shop/dell-laptops/xps-15-laptop/spd/xps-15-7590-laptop/xn7590edldh#features_section</p> </div>
<p>[1.4] at least one auxiliary module connected to said platform in</p>	<p>Defendant provides a modular computer user interface system comprising at least one auxiliary module connected to said platform in segregated relation to said keyboard.</p> <p>This element is infringed literally, or in the alternative, under the doctrine of</p>

segregated
relation to said
keyboard,

equivalents.

For example, Defendant provides USB Wired Numeric Keypad (“auxiliary module”) which is connected to the platform through USB interface assembly. USB Wired Numeric Keypad is not an integral part of the platform and is connected to the platform using USB interface assembly in segregated relation to the keyboard of XPS 15.



USB WIRED NUMERIC KEYPAD

★★★★☆ 4.4 (28) Ask a question

\$25.99

Free Standard Delivery

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Up to \$1 back in rewards

View Delivery Dates



Add to Cart

Manufacturer Part AKP10US | Dell Part A6928588 | Order Code A6928588

☐ Compare

Source: <https://www.dell.com/en-us/shop/usb-wired-numeric-keypad/apd/a6928588/pc-accessories>



Source: <https://www.dell.com/en-us/shop/usb-wired-numeric-keypad/apd/a6928588/pc-accessories>

- Connects to a laptop or desktop computer using an included cable with USB connector.
- USB port required. True plug-and-play device; no drivers required.

Tech Specs

Device Type
Keypad

Interface
USB

Connectivity Technology
Wired

Color
Black

Source: <https://www.dell.com/en-us/shop/usb-wired-numeric-keypad/apd/a6928588/pc-accessories>

[1.5] an interface assembly connected at least in part to said platform and structured to operatively interconnect said auxiliary module and said processor,

Defendant provides a modular computer user interface system comprising an interface assembly connected at least in part to said platform and structured to operatively interconnect said auxiliary module and said processor.

This element is infringed literally, or in the alternative, under the doctrine of equivalents.

For example, Defendant's USB Wired Numeric Keypad ("auxiliary module") comprises USB interface assembly. USB interface assembly interconnects USB Wired Numeric Keypad to the XPS 15's processor to provide input functionalities.



USB WIRED NUMERIC KEYPAD

★★★★★ 4.4 (28) Ask a question

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Add to Cart

Manufacturer Part AKP10US | Dell Part A6928588 | Order Code A6928588

☐ Compare

Source: <https://www.dell.com/en-us/shop/usb-wired-numeric-keypad/apd/a6928588/pc-accessories>



Source: <https://www.dell.com/en-us/shop/usb-wired-numeric-keypad/apd/a6928588/pc-accessories>

- Connects to a laptop or desktop computer using an included cable with USB connector.
- USB port required. True plug-and-play device; no drivers required.


Tech Specs

Device Type
Keypad

Interface
USB

Connectivity Technology
Wired

Color
Black

<p>[1.6] said auxiliary module including a programable application integrated therein and a display assembly, and</p>	<p>Source: https://www.dell.com/en-us/shop/usb-wired-numeric-keypad/apd/a6928588/pc-accessories</p> <p>Defendant provides a modular computer user interface system comprising said auxiliary module including a programable application integrated therein and a display assembly.</p> <p>This element is infringed literally, or in the alternative, under the doctrine of equivalents.</p> <p>For example, Defendant's USB Wired Numeric Keypad ("auxiliary module") provides functionality of 19 keys including function and document navigation controls ("programable application") and Defendant's XPS 15 comprises a 15.6-inch 4K UHD display ("display assembly").</p>  <p>Source: https://www.dell.com/en-us/shop/usb-wired-numeric-keypad/apd/a6928588/pc-accessories</p>
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The Targus Numeric Keypad allows users to type numbers into spreadsheets and other applications quickly and easily. The full-size 19mm keys improve speed and accuracy by making it easier to locate and press the numbers you are looking for. The integrated ergonomic tilt provides added comfort which helps reduce strain after a long work day. The USB cord is 3 feet long to provide additional flexibility in the workspace. Ideal for in office or in home use.

- Connects to a laptop or desktop computer using an included cable with USB connector.
- USB port required. True plug-and-play device; no drivers required.

Source: <https://www.dell.com/en-us/shop/usb-wired-numeric-keypad/apd/a6928588/pc-accessories>

Memory [More Info](#)

16GB DDR4-2666MHz, 2x8G

Hard Drive [More Info](#)

512GB M.2 PCIe NVMe Solid State Drive


Display [More Info](#)

15.6" 4K UHD (3840 x 2160) OLED InfinityEdge Anti-Reflective Non-Touch 100% DCI-P3 400-Nits display

Wireless [More Info](#)

Killer Wi-Fi 6 AX1650 (2x2) and Bluetooth 5.0

Source: https://www.dell.com/en-us/shop/dell-laptops/xps-15-laptop/spd/xps-15-7590-laptop/xn7590edldh#features_section

	 <p>Source: https://www.dell.com/en-us/shop/dell-laptops/xps-15-laptop/spd/xps-15-7590-laptop/xn7590edldh#features_section</p>
<p>[1.7] said display assembly responsive to visually display a selected function of said programable application.</p>	<p>Defendant provides a modular computer user interface system comprising said display assembly responsive to visually display a selected function of said programable application.</p> <p>This element is infringed literally, or in the alternative, under the doctrine of equivalents.</p> <p>For example, Defendant's XPS 15 comprises a 15.6-inch 4K UHD display assembly which produces a visual output in response to the selection of one of the 19 keys including function and document navigation controls from the Defendant's USB Wired Numeric Keypad. Each key of the USB Wired Numeric Keypad has a specific functionality and comprises a corresponding visual change which is displayed on the XPS 15's display.</p>



Source: <https://www.dell.com/en-us/shop/usb-wired-numeric-keypad/apd/a6928588/pc-accessories>

The Targus Numeric Keypad allows users to type numbers into spreadsheets and other applications quickly and easily. The full-size 19mm keys improve speed and accuracy by making it easier to locate and press the numbers you are looking for. The integrated ergonomic tilt provides added comfort which helps reduce strain after a long work day. The USB cord is 3 feet long to provide additional flexibility in the workspace. Ideal for in office or in home use.

- Connects to a laptop or desktop computer using an included cable with USB connector.
- USB port required. True plug-and-play device; no drivers required.

Source: <https://www.dell.com/en-us/shop/usb-wired-numeric-keypad/apd/a6928588/pc-accessories>

Memory [More Info](#)

16GB DDR4-2666MHz, 2x8G

Hard Drive [More Info](#)

512GB M.2 PCIe NVMe Solid State Drive

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15.6" 4K UHD (3840 x 2160) OLED InfinityEdge Anti-Reflective Non-Touch 100% DCI-P3 400-Nits display

Wireless [More Info](#)

Killer Wi-Fi 6 AX1650 (2x2) and Bluetooth 5.0

Source: https://www.dell.com/en-us/shop/dell-laptops/xps-15-laptop/spd/xps-15-7590-laptop/xn7590edldh#features_section



Source: https://www.dell.com/en-us/shop/dell-laptops/xps-15-laptop/spd/xps-15-7590-laptop/xn7590edldh#features_section

1. List of References

1. https://www.dell.com/en-us/shop/dell-laptops/xps-15-laptop/spd/xps-15-7590-laptop/xn7590edldh#features_section , last accessed on March 18, 2021
2. <https://www.dell.com/en-us/shop/usb-wired-numeric-keypad/apd/a6928588/pc-accessories> , last accessed on March 18, 2021